

BLEICHMAR FONTI & AULD LLP
LESLEY E. WEAVER
 1999 Harrison Street, Suite 670
 Oakland, CA 94612
 Telephone: (415) 445-4003
 Facsimile: (415) 445-4020
 Email: lweaver@bfalaw.com

MOTLEY RICE LLC
GREGG S. LEVIN (admitted *pro hac vice*)
 28 Bridgeside Blvd.
 Mt. Pleasant, SC 29464
 Telephone: (843) 216-9000
 Facsimile: (843) 216-9450
 Email: glevin@motleyrice.com

Liaison Counsel

Lead Counsel for the Class

[Additional counsel appear on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

DORIS SHENWICK, et al.,

Plaintiff,

v.

TWITTER, INC., et al.,

Defendants.

Case No. 3:16-cv-05314-JST

**STIPULATION AND ~~PROPOSED~~
 SCHEDULING ORDER AND REQUEST
 TO ASSOCIATE ADDITIONAL COUNSEL**

CLAIRE DEGENHARDT, Individually and on
 Behalf of All Others Similarly Situated,

Plaintiff,

v.

TWITTER, INC., RICHARD COSTOLO and
 ANTHONY NOTO,

Defendants.

Case No. 3:16-cv-05439-JST

Pursuant to Civil Local Rule 7-12, the parties, lead plaintiff KBC Asset Management NV (“KBC” or “Lead Plaintiff”) and defendants Twitter, Inc., Richard Costolo, and Anthony Noto (collectively, “Defendants”), by and through their undersigned counsel of record, submit the following stipulation and proposed order:

WHEREAS, on December 22, 2016, the Court held a hearing on pending motions to appoint Lead Plaintiff and Lead Counsel and to consolidate two related securities fraud cases, ECF No. 71;

WHEREAS, on the same day, the Court issued a written order granting KBC’s motion for appointment as Lead Plaintiff, approving its selection of Motley Rice LLC (“Motley Rice”) as Lead Counsel and Bleichmar Fonti & Auld LLP as liaison counsel, and consolidating *Shenwick v. Twitter*, No. 3:16-cv-05314, with *Degenhardt v. Twitter*, No. 3:16-cv-05439, ECF No. 72;

WHEREAS, during the December 22, 2016 hearing, the Court ordered the parties to submit by January 13, 2017 a stipulated or competing proposed case schedule(s), said schedule(s) to include a date for an initial case management conference (“CMC”), and to address Lead Plaintiff’s intent to associate certain counsel, ECF No. 71;

WHEREAS, the parties have met, conferred, and agreed on a proposed schedule;

NOW THEREFORE, the parties hereby agree and stipulate to the following:

1. Lead Plaintiff shall file a Consolidated Amended Complaint no later than March 2, 2017;
2. An initial CMC shall be scheduled for April 19, 2017 at 2:00 p.m.;
3. Defendants’ Motion to Dismiss Plaintiffs’ Consolidated Amended Complaint (“Motion to Dismiss”) shall be filed on or before May 2, 2017;
4. Lead Plaintiff’s opposition to Defendants’ Motion to Dismiss shall be filed on or before June 21, 2017;
5. Defendants’ Reply Memorandum in support of their Motion to Dismiss shall be filed on or before August 7, 2017; and
6. The hearing on Defendants’ anticipated Motion to Dismiss shall be scheduled for Thursday, September 14, 2017 at 2:00 p.m.

OTHER MATTERS

During the December 22, 2016 hearing, Lead Counsel mentioned its intent to associate Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) in this case to work at Lead Plaintiff and Lead Counsel’s direction in light of Robbins Geller’s extensive investigation and development of the case which work product would be needlessly duplicative and expensive to replicate. Lead Counsel’s association of additional counsel will not increase fees or costs potentially borne by the putative class.

Defendants take no position on Lead Counsel’s request to associate Robbins Geller.

Dated: January 13, 2017

Respectfully submitted,

BLEICHMAR FONTI & AULD LLP

By: /s/ Lesley E. Weaver

Lesley E. Weaver
1999 Harrison Street, Suite 670
Oakland, CA 94612
Telephone: (415) 445-4003
Facsimile: (415) 445-4020
Email: lweaver@bfalaw.com

Joseph A. Fonti (*admitted pro hac vice*)
7 Times Square, 27th Floor
New York, NY 10036
Telephone: (212) 789-1340
Facsimile: (212) 205-3960
Email: jfonti@bfalaw.com

Liaison Counsel

MOTLEY RICE LLC

Gregg S. Levin (*admitted pro hac vice*)
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
Telephone: (843) 216-9000
Facsimile: (843) 216-9450
Email: glevin@motleyrice.com

Lead Counsel for the Class

Dated: January 13, 2017

SIMPSON THACHER & BARTLETT LLP

By: /s/ Simona G. Strauss
Simona G. Strauss

2475 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 251-5000
Facsimile: (650) 251-5002
Email: ss Strauss@stblaw.com

SIMPSON THACHER & BARTLETT LLP
Jonathan K. Youngwood (admitted *pro hac vice*)
425 Lexington Ave
New York, NY 10017-3954
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: jyoungwood@stblaw.com

*Attorneys for Defendants Twitter, Inc., Anthony
Noto, and Richard Costolo*

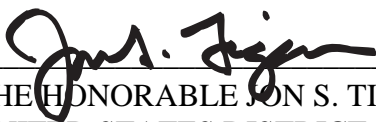
I, Lesley E. Weaver, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Scheduling Order and Request to Associate Additional Counsel. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Simona G. Strauss has concurred in this filing.

/s/ Lesley E. Weaver
Lesley E. Weaver

Pursuant to Stipulation, the foregoing schedule is adopted by the Court. In addition, the Court approves Lead Counsel's association of Robbins Geller Rudman & Dowd LLP.

IT IS SO ORDERED.

DATED: January 18, 2017


THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE